IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

RESPONSE TO HERRING NETWORKS, INC'S MOTION TO JOIN AND SUPPLEMENT FOX NEWS NETWORK, LLC'S MOTION TO INTERVENE FOR LIMITED PURPOSES

The State Defendants submit this response to Herring Networks, Inc's ("OAN") Motion to Join and Supplement Fox News Network, LLC's ("FNN") Motion to Intervene for the purpose of obtaining Dr. Halderman's report, [Doc. 1287]. This Court is currently considering the release of Dr. Halderman's report and Dr. Halderman has provided the report to the United States Cybersecurity and Infrastructure Security Agency ("CISA"), as directed by the Court. Until this Court rules upon release of the report, the State Defendants remain obligated to oppose the motion for the reasons stated in their Response to FNN's motion, incorporated by reference here, [Doc. 1286].

Respectfully submitted this 10th day of February 2022.

/s/ Vincent R. Russo

Vincent R. Russo Georgia Bar No. 242628 vrusso@robbinsfirm.com Josh Belinfante Georgia Bar No. 047399 jbelinfante@robbinsfirm.com Carey A. Miller Georgia Bar No. 976240 cmiller@robbinsfirm.com Alexander Denton Georgia Bar No. 660632 adenton@robbinsfirm.com Robbins Alloy Belinfante Littlefield LLC 500 14th Street, N.W. Atlanta, Georgia 30318 Telephone: (678) 701-9381

Facsimile: (404) 856-3255

Bryan P. Tyson Georgia Bar No. 515411 btyson@taylorenglish.com Jonathan D. Crumly Georgia Bar No. 199466 jcrumly@taylorenglish.com James A. Balli Georgia Bar No. 035828 jballi@taylorenglish.com Diane F. LaRoss Georgia Bar No. 430830 dlaross@taylorenglish.com Bryan F. Jacoutot Georgia Bar No. 668272 bjacoutot@taylorenglish.com Loree Anne Paradise Georgia Bar No. 382202 lparadise@taylorenglish.com TAYLOR ENGLISH DUMA LLP 1600 Parkwood Circle, Suite 200 Atlanta, Georgia 30339 Telephone: 678-336-7249

Counsel for State Defendants

L.R. 7.1(D) CERTIFICATION

I certify that this Notice of Filing has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Response has been prepared using 13-pt Century Schoolbook font.

<u>/s/ Vincent R. Russo</u> Vincent R. Russo